

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

VS.

GREGORY A. WILSON

:
: NO. 4: 23-CR-298
:
: Chief Judge Brann

WILSON'S SENTENCING BRIEF

BACKGROUND

On February 20, 2024, pursuant to a plea agreement, Defendant entered a plea of guilty to Count 1 of the indictment in violation of 18 U.S.C. Section 2422(b), Attempted Enticement of a Minor to Engage in Sexual Activity or Prostitution, which is punishable by 10 years to life imprisonment and a fine of up to \$250,000.00.

18 U.S.C. SECTION 3553 FACTORS

Nature and Circumstances of the offense

The facts are well-described in Paragraphs 8-14 of the presentence report and are not contested by the Defendant.

History and Characteristics of the Defendant

Defendant is a 51 year-old divorced father of 3 adult children who resided in Lewistown, PA prior to his arrest on November 8, 2023. He owns his own home and has been gainfully employed for many years. He is a high school graduate and has no criminal record.

Defendant is “well-liked” and “family focused” and is described by his daughter, Cassidy Wilson, as very kind and a good father. He is a respected softball coach of many years.

Defendant suffers from anemia, hypertension, hyperlipidemia, hyperglycemia and sleep apnea, He also suffers from depression and alcoholism. His conduct in this case occurred after a bout of heavy drinking brought on by a failed relationship and was an aberration that will not, in this writer’s opinion, be repeated. Defendant is remorseful and has accepted responsibility for his crime.

The Sentence

The offense level is 27 and the Criminal History Category is I resulting in a guideline range of 70-87 months. However, because of the mandatory minimum that applies, the guideline range becomes 120 months.

The Need to Avoid Unwarranted Sentence Disparities

A sentence within the advisory guideline range of 70-87 months will not result in an

unwarranted sentence disparity among defendants with similar records who have been found guilty of similar conduct.

Restitution

Because there is no identifiable victim, restitution is not at issue. See Paragraph 73 of the PSR.

CONCLUSION

For the aforesaid reasons, Defendant requests a sentence within the guideline range of 70-87 months with a recommendation that he serve his sentence at the FCI-Allenwood Medium or Low Security with participation in the RDAP program, if eligible.

Respectfully submitted,

G. Scott Gardner /s/

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